

corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: No.

SUPPLEMENTAL RESPONSE: Exclusive Moving and Delivery, LLC is not a publicly owned company. It has no parent corporation. No publicly held corporation owns ten percent or more of its stock. It is not a parent of any publicly owned company. It does not own 10% or more of the outstanding shares of any publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).
See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: This is a motor vehicle accident case involving an accident which occurred in Orangeburg County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a 25 determination of whether the cases arise from the same or identical transactions, happenings, or

events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Not applicable.

(H) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a). 26

RESPONSE: Plaintiff's citizenship is South Carolina; Defendant Exclusive Moving and Delivery, LLC is incorporated in North Carolina and maintains its principal place of business in Charlotte, North Carolina. None of its members reside in South Carolina. Defendant Franklyn F. Rodriguez is a citizen of North Carolina who resides in Charlotte, North Carolina.

SUPPLEMENTAL RESPONSE: Defendant Exclusive Moving and Delivery, LLC's members are Brian Aguilar, Grethel Espinosa, and Oscar Guevara. All three members are citizens and residents of Mecklenburg County, North Carolina and were when suit was filed and when Defendants removed this matter.

Respectfully submitted this 22nd day of July 2025.

By: /s/ W. James Flynn
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